

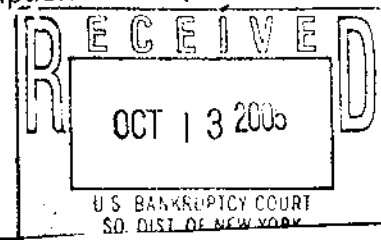
**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In the Matters of:)	Case No. 05-44481 (RDD)
)	(Chapter 11 – Jointly Administered)
DELPHI CORPORATION, <u>et al.</u>)	
)	
Debtors-in-Possession.)	Hon. Robert D. Drain
)	

**MOTION UNDER LOCAL BANKRUPTCY RULE 2090-1(b) FOR
ADMISSION PRO HAC VICE OF GARY H. CUNNINGHAM**

1. Gary H. Cunningham is a shareholder of the law firm of Strobl Cunningham & Sharp, P.C. (SC&S) and is the practice leader of SC&S' corporate restructuring department. Mr. Cunningham has appeared as lead or special counsel in a number of bankruptcy courts in other jurisdictions in other Chapter 11 cases, including the Eastern and Western Districts of Michigan, the Southern District of New York, and the Northern and Southern Districts of Ohio. A copy of Mr. Cunningham's professional biography is attached hereto and incorporated herein by reference. Mr. Cunningham is admitted, practicing and in good standing as a member of the bars of the State of Michigan, the District Courts for the Eastern and Western Districts of Michigan, the United States District Courts for the Northern and Southern Districts of Ohio, the United States District Courts for the Eastern and Western Districts of Pennsylvania, the Federal Circuit Court of Appeals, the Sixth Circuit Court of Appeals and the United States Supreme Court. There are no disciplinary proceedings pending against Mr. Cunningham.

2. The Movant requests the Court to grant this Motion so that the Admittee may file pleadings and appear and be heard at hearings in the captioned Chapter 11



proceedings on behalf of Specmo Enterprises, Inc. and other creditors or interested parties.

3. The Admittee submits to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the course of these cases. In addition, the Admittee has access to a copy of the Local Bankruptcy Rules and is generally familiar with such rules.

4. The Admittee agrees to pay a fee of \$25.00 on entry of an order granting admission to practice *pro hac vice*.

5. Because the legal points and authorities upon which this Motion relies are incorporated herein, the Movant respectfully requests that the requirement of the service and filing of a separate memorandum of law under Local Rules 9013-1(b) be deemed satisfied.

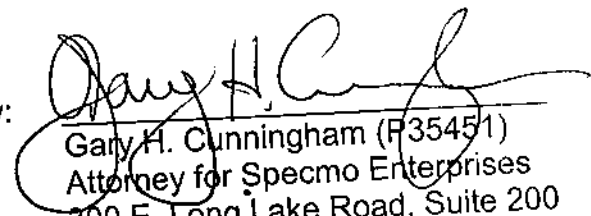
WHEREFORE, the Movant respectfully requests that this Court enter an order, in the form attached hereto, permitting the Admittee to appear *pro hac vice* as counsel for Specmo Enterprises, Inc. and other creditors or interested parties in these jointly administered cases.

Dated: October 12, 2005

Respectfully submitted,

STROBL CUNNINGHAM & SHARP, P.C.

By:


Gary H. Cunningham (P35451)
Attorney for Specmo Enterprises
300 E. Long Lake Road, Suite 200
Bloomfield Hills, Michigan 48304
Telephone: (248) 540-2300
Facsimile: (248) 645-2690

CURRICULUM VITAE OF GARY H. CUNNINGHAM

Education

University of Michigan (B.G.S. 1975, M.A. 1977); Detroit College of Law (J.D. 1980); Senior Staff Member, Detroit College of Law Review (1978-1980).

Publications

1. PBB Action Committee v. DNR: The Feasible and Prudent Alternative Argument Under the Michigan Environmental Protection Act, 1979 Det. Coll. L. Rev. 457.

2. Bankruptcy Law, Fifth Annual Review of Sixth Circuit Law, 1984 Det. Coll. L. Rev. 301.

3. Mortgage Foreclosures in Michigan, National Business Institute (1990).

4. Drafting Chapter 11 Plans and Post-Confirmation Issues, American Bankruptcy Institute (1997).

5. Are Preferential Transfers Dead in the Sixth Circuit? Federal Bar Association (1997).

Bar Admissions

State of Michigan; U.S. District Court, Eastern and Western Districts of Michigan, U.S. Court of Appeals, Federal Circuit and Sixth Circuit and the United States Supreme Court.

Bar Memberships

American Bar Association (Member, Business Law Section); Federal Bar Association (Chairman, Bankruptcy Section, 1989-1991); Oakland County Bar Association (Member, Business Law Committee); State Bar of Michigan (Member, Corporation, Finance and Business Law Section).

Club Memberships

American Bankruptcy Institute
Commercial Law League of America
Delta Theta Phi Law Fraternity
Detroit Economic Club
Detroit Institute of Arts

Associations

Law Intern to Magistrate Paul L. Komives, U.S. District Court, Eastern District of Michigan, 1979; Law Clerk to Bankruptcy Judge Harold H. Bobier, U.S. Bankruptcy Court, Eastern District of Michigan, 1980-1982; Estate Administrator, U.S. Bankruptcy Court, Eastern District of Michigan, 1982-1983; Partner, Schluskel, Lifton, Simon, Rands, Galvin & Jackier, 1983-1990; Partner, Kramer Mellen, P.C., 1990-1995; Principal Shareholder, Strobl Cunningham & Sharp, P.C., 1995 to present.

SELECTED SIGNIFICANT PAST CASE EXPERIENCE

Counsel for the Creditors Committee:

- Long Development, Inc., Chapter 11 Proceedings, Judge James D. Gregg.
- Michigan Boiler & Engineering Company, Chapter 11 Proceedings, Judge Walter Shapero.
- Trinity Broadcasting Corporation, Chapter 11 Proceedings, Judge Steven W. Rhodes.
- Voplex Corporation, Chapter 11 Proceedings, Judge Ray Reynolds Graves.

Counsel for the Debtor:

- AutoPlas, Inc., Chapter 11 Proceedings, Judge Steven W. Rhodes.
- Burton Advertising Incorporated, Chapter 11 Proceedings, Judge Ray Reynolds Graves.
- Cardinal Lodging Group, Chapter 11 Proceedings, Judge Barbara J. Sellers (Columbus, Ohio).
- Cole Associates, Inc., Chapter 11 Proceedings, Judge Robert K. Rodibaugh (South Bend, Indiana).
- Fretter, Inc., Chapter 11 Proceedings, Judge Pat E. Morgenstern-Clarren (Cleveland, Ohio).
- Great Northwestern Office Building, Chapter 11 Proceedings, Judge Stanley B. Bernstein.
- Macatawa Hospitality, Inc., Chapter 11 Proceedings, Judge Laurence E. Howard.
- Northland Point Partners, Chapter 11 Proceedings, Judge Ray Reynolds Graves.

Counsel for a Secured Creditor:

- Berkey, Inc., Chapter 11 Proceedings, Judge Tina L. Brozman (New York City).
- Bilcor Plastics, Inc., Chapter 11 Proceedings, Judge Ray Reynolds Graves.
- The Charter Company, Chapter 11 Proceedings, Judge George L. Proctor (Jacksonville, FL)
- Dow Corning Corporation, Chapter 11 Proceedings, Judge Arthur J. Spector.
- F&M Distributors, Inc., Chapter 11 Proceedings, Judge Walter Shapero.
- Gander Mountain, Inc., Chapter 11 Proceedings, Russell A. Eisenberg (Milwaukee, WI).

- Hill Forest Products, Chapter 11 Proceedings, Judge Arthur J. Spector.
- Michigan Pharmacal Corporation, Chapter 11 Proceedings, Judge Francis G. Conrad (New York City).
- Pal Nissan, Inc., Chapter 11 Proceedings, Judge James D. Gregg.
- Perry Davis Hotel, Chapter 11 Proceedings, Judge Laurence E. Howard.
- Pine Knob Investment Company, Chapter 11 Proceedings, Judge Ray Reynolds Graves.
- Topinka's Country House, Chapter 11 Proceedings, Judge George Brody.

Counsel for a Shareholder:

- Chattanooga Choo-Choo Company, Chapter 11 Proceedings, Judge Ralph H. Kelley (Chattanooga, Tennessee).
- Everlock Fastening Systems, Chapter 11 Proceedings, Judge Walter Shapero.
- Great Lakes Water Blasting, Inc., Chapter 11 Proceedings, Judge Walter Shapero.
- Sun Valley Foods Company, Chapter 11 Proceedings, Judge George Brody.
- Weyand Fisheries, Chapter 11 Proceedings, Judge Walter Shapero.

Counsel for the Trustee:

- B&E Sales Company, Chapter 7 Proceedings, Judge Walter Shapero.
- William and Francis Bridge, Chapter 7 Proceedings, Judge Steven W. Rhodes.
- Cardinal Industries, Chapter 11 Proceedings, Judge Barbara J. Sellers (Columbus, Ohio).
- Diamond Mortgage Company, Chapter 7 Proceedings, Judge George Brody.
- Remvest Federal Association, Chapter 11 Proceedings, Judge Stanley B. Bernstein.

Estate Administrator
Farm Bureau Services, Inc.
Chapter 11 Proceedings
Judge Harvey D. Walker

Law Clerk
Detroit Port Development
Chapter X Proceedings
Judge Damon J. Keith

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In the Matters of:)	Case No. 05-44481 (RDD)
)	(Chapter 11 – Jointly Administered)
DELPHI CORPORATION, <u>et al.</u>)	
)	
Debtors-in-Possession.)	Hon. Robert D. Drain
)	

ORDER GRANTING ADMISSION *PRO HAC VICE* FOR GARY H. CUNNINGHAM

Upon consideration of the Motion Under Local Bankruptcy Rule 2090-1(b) for Admission *Pro Hac Vice* of Gary H. Cunningham (the "Motion"), a shareholder in the law firm of Strobl Cunningham & Sharp, P.C., for the admission *pro hac vice* of Gary H. Cunningham, and it appearing to the Court that good and sufficient cause appearing therefore, and after due deliberation thereon; NOW, THEREFORE;

IT IS HEREBY ORDERED that Gary H. Cunningham is permitted to appear *pro hac vice* as counsel to Specmo Enterprises, Inc. and any other creditor and/or interested party in the above-captioned chapter 11 cases.

IT IS HEREBY FURTHER ORDERED that the requirement under Rule 9013-1(b) of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York for the service and filing of a separate memorandum of law is deemed satisfied by the Motion.

Dated: _____

United States Bankruptcy Judge